

-----Original Message-----

**From:** Novak, Jean [SMTP:jlnovak@qwest.com]  
**Sent:** Thursday, November 14, 2002 9:17 AM  
**To:** klclauson@eschelon.com  
**Cc:** bjjohnson@eschelon.com; Masztaler, Joan; Dubuque, Toni; Richardson, Anne; Austin, Coleen  
**Subject:** UNE - E Response to September 13, 2002

Karen,  
Joan has asked that I provide to you this response to the email sent on September 13, 2002.

Thanks, jean



une STAR

RESPONSE to Karen Cla..

## MEMORANDUM

TO: Karen Clauson

FROM: Joan Masztaler

DATE: November 14, 2002

RE: UNE-E Mechanization

I am responding formally to your email correspondence of September 13, 2002 to Jean Novak regarding "UNE-E accurate billing." My response attends to the main issue raised by your email regarding mechanized billing of UNE-E, as well as an issue that Eschelon has treated in the past as related to mechanized billing – DMOQ credits. Finally, I seek some clarification from you regarding an aspect of your email that I do not understand.

Background: As you know, UNE-E was essentially a customized product that Qwest agreed to implement for Eschelon. Its rates were not loaded or loadable into Qwest's billing system, and Eschelon's monthly invoice for UNE-E had to be generated using resale rates. In short, a "mechanized" bill reflecting UNE-E at UNE rates rather than resale rates presented some system analysis and modification. In order to immediately offer the UNE-E product, Qwest and Eschelon jointly agreed upon a manual process to true-up the monthly invoices – a process which ensures that the amount actually billed to Eschelon is accurate and mutually agreed upon prior to any cash outlay by Eschelon. This process effectively solved the problem that the UNE-E invoices were not mechanized. In other words, Eschelon has not had to pay more, for UNE-E than the value of UNE-E services Eschelon actually received.

In an ongoing series of discussions involving executives of both companies, Eschelon has described a need to receive mechanized invoices (monthly) for UNE-E services provided by Qwest. Qwest has tried to meet Eschelon's stated need, and has worked hard to find a way to mechanize the UNE-E billing system, even though demand for UNE-E is clearly on the decline now as new orders are nearly at a standstill (being replaced by the UNE-P). The issue of mechanized billing has expended a significant amount of Qwest's time and resources over the past several months.

Mechanization Status: There are two pieces to the mechanization of the UNE-E product, first the mechanization of new orders that will be placed as UNE-E and subsequently billed as UNE-E; and second the conversion of the current embedded base. Qwest identified a means to effect the mechanization Eschelon requested of both new orders and the embedded base. Qwest has already invested heavily in the project and will move forward with the mechanization of new orders. As of December 20, 2002, any new UNE E order can be issued via IMA and will appear on your monthly billing statement as UNE E.

For the existing embedded base of UNE-E Qwest stands ready, willing and able to complete this mechanization as well. At the 11<sup>th</sup> hour, however, Eschelon has reversed its position and now states it does not wish to proceed with mechanization of the embedded base. Eschelon's stated rationale appears to be that a *potential* risk to the embedded base of UNE-E customers *perceived* to be associated with the implementation of the project is beyond an acceptable level. Qwest disagrees that there is a significant *bona fide* risk associated with the implementation of the mechanization as planned. Qwest acknowledges, as it always has in response to Eschelon's request for a "guarantee" of perfection in the context of this implementation, that human error is a possibility, on the part of Eschelon's personnel and Qwest's personnel, in any implementation process that involves some manual steps.

In any event, Eschelon can't have it both ways. Eschelon can't complain about manual billing on the one hand, but refuse to permit mechanization of the embedded base on the other. If Eschelon decides to reject the mechanization of the embedded base that it has previously requested, Qwest will abandon the project for the conversion of the embedded base, even though Qwest stands ready to implement it. But, Qwest demands that Eschelon affirmatively acknowledge that, in rejecting the mechanization, Eschelon knowingly and intentionally compromises any further claim for DMOQs based on UNE-E billing (at least insofar as it relates to the lack of mechanization).

DMOQs: In light of the manual reconciliation process agreed upon, and its effective resolution *in advance of cash payments or billing credits* of any difference between resale rates and UNE rates, it is disingenuous for Eschelon to claim that Qwest's UNE-E billing triggers BI-4 violations for purposes of DMOQ calculations. DMOQs, in the context of "accurate billing," are intended to ensure that one party does not pay more for a service than it should be paying. In short, accurate billing means that the amount charged/paid mirrors the value of the services received. The manual process agreed upon has operated effectively, and both parties have routinely and amicably come to agreement on the true-up amounts. In the few cases wherein Eschelon believed the true-up amounts were inaccurate, the amounts involved were minimal. Furthermore Qwest tended to the matter and corrected any errors. Indeed, from a cash flow perspective, Eschelon has benefited under the manual system, as Qwest has forwarded dollars in advance to Eschelon to reconcile any difference between resale and UNE rates. Thus, although Eschelon has not "overpaid" for UNE-E services received, Eschelon has enjoyed the benefit of "services plus cash" each month, and actually has a net gain in value each month, at least until it pays the outstanding invoice.

As noted, the manual system is working for the parties. Eschelon's try for DMOQs in this context is legally and factually untenable, and Qwest does not believe the MPUC would countenance the windfall it would represent to Eschelon. Qwest strenuously objects to Eschelon's calculation of DMOQ credits under BI-4 using the monthly UNE-E bills to trigger the BI-4 count, and Qwest will litigate this issue if necessary.

Request for Clarification: You have previously referred to a contractual obligation, or "promise" by Qwest to implement mechanized billing. I would appreciate your providing me the documentation demonstrating such a contractual obligation. Qwest legal teams have reviewed the documents addressing the various contractual rights and obligations between our companies, and do not find any agreement relating to a promise to mechanize the monthly bills for UNE-E. There are documents regarding mechanization in the area of switched access to assist in calculation of minutes of use, but nothing regarding mechanizing UNE-E invoices *per se*. I would appreciate receiving the documentary basis of the "promise" to which you frequently refer.

In summary, Qwest is unable to confirm the existence of a contractual obligation regarding mechanized UNE-E billing, and if one were established, any dispute connected to such an obligation would appear to have been fully resolved on March 1, 2002.

-----Original Message-----

**From:** Clauson, Karen L.  
**Sent:** Thursday, November 14, 2002 1:41 PM  
**To:** 'Mark A. Myhra'  
**Subject:** FW: UNE - E mechanization/ Qwest November 14, 2002 Response to Eschelon September 13, 2002 email/Eschelon reply

fyi

-----Original Message-----

**From:** Clauson, Karen L.  
**Sent:** Thursday, November 14, 2002 10:41 AM  
**To:** 'Novak, Jean'; Masztaler, Joan  
**Cc:** Johnson, Bonnie J.; Dubuque, Toni; Richardson, Anne; Austin, Coleen; 'Corbetta, Richard'; Markert, William D.; Oxley, J. Jeffery  
**Subject:** RE: UNE - E mechanization/ Qwest November 14, 2002 Response to Eschelon September 13, 2002 email/Eschelon reply

We asked for a response two months ago, and only after repeating our request for a response, did we receive this letter.

This issue is not closed, and Eschelon does not agree with the statements in your letter. The manual system is not working. It results in 100% inaccurate bills, and the true up is only an approximation of the rate and not the true rate. Qwest has not lived up to its agreement. Both McLeod and Eschelon testified at the July AZ 271 workshop to the interim nature of the arrangement, and Qwest's promises to mechanize. Qwest also testified that it was mechanizing UNE-E. Qwest's belated argument that it doesn't have an obligation to do so after March, even though it represented it was doing so in July, will likely ring hollow with the AZ commission, as it does with us.

As outlined in Eschelon's September 13 email, with its enclosures (copied below), the representations that Qwest made about work it claimed it was doing and has done are very different from what Qwest is now saying. Qwest promised a mechanized process that would avoid customer affecting problems. In fact, Qwest claimed that many hours of systems work had already been done to accomplish that mechanization. Now, Qwest is proposing a highly manual process that experience with Qwest's manual processes shows is a bona fide problem. Qwest has never explained why it said for a long time that it was working on a "tool" to mechanize this process, then told us that no work had been done and this would have to go through CMP with a high estimate of hours for the level of effort, then retracted that statement and said the systems work had mostly been done, and then said, never mind, this will be manual. Qwest's obligation to do the mechanization has not changed; its position as to meeting that commitment has shifted all over the board.

Regarding the last sentence of your letter, Qwest specifically agreed, in the March 1 Settlement Agreement (paragraph 3(e)), to make UNE-E available using existing business processes. The existing businesses process includes using an interim only true up while Qwest completes mechanization, which it agreed to do some time ago. If the existing process were to change, the language in paragraph 3(e) would be quite different. It would say that the existing process would be changed from interim to final and would be used without mechanization, contrary to Qwest's commitment to the contrary. Not only

does the agreement not say that, such a dramatic change in the terms of UNE-E was never discussed. I have copied Richard Corbetta, who was involved in those discussions, unlike any of the other Qwest representatives on this email. He knows that Qwest never made such a request to change the terms in that manner. We agreed to proceed with UNE-E, and Qwest has failed to live up to this commitment, as well as its earlier ones.

With respect to DMOQs, Eschelon made no such agreement. The bills are 100% inaccurate. This should be reflected in the billing accuracy measure. Qwest owes Eschelon money pursuant to the DMOQs.

I am out this afternoon and tomorrow. After I return, we'll decide whether to respond more fully or just go directly to the Commissions.

Our email:



UNE-E accurate billing

Qwest's response:



une STAR  
RESPONSE to Karen Cla..

-----Original Message-----

**From:** Clauson, Karen L.  
**Sent:** Friday, September 13, 2002 1:21 PM  
**To:** 'Novak, Jean'  
**Cc:** 'Masztaler, Joan'; 'Beach, Jennifer'; 'Rein, Kathy'; 'Austin, Coleen'; 'Richardson, Anne'; Koetke, Michelle E.; mam@gr-espel.com; richard.corbetta@qwest.com; Korthour, Mary J.; Powers, F. Lynne; Johnson, Bonnie J.; Markert, William D.  
**Subject:** UNE-E accurate billing

Bonnie told you that we would respond to Qwest's plan for UNE-E mechanization by today. Here you go:

Embedded base: Qwest has presented to Eschelon its current plan for mechanization to provide accurate bills for UNE-E (i.e., reflecting UNE-E instead of resale rates). We appreciate the information that you provided during the conference call. As I said on the call, however, unfortunately the plan Qwest described relies too heavily on manual handling. There is too much risk of adverse end-user impact. And, the current plan would impose resource burdens on Eschelon when Qwest agreed to do this for Eschelon. Qwest needs to present to Eschelon a plan that is consistent with Qwest's obligations to provide accurate bills and to do so without imposing these risks and burdens on Eschelon. As indicated below, Qwest previously described the changes it was making to do this conversion as a billing only change, and Qwest needs to deliver on its promise to do the work on its back end without impacting our customers.

New orders: With respect to new UNE-E ordering on a going forward basis, Eschelon is interested in submitting trial orders to test this process. We need to ensure that all of the features, functionalities, and capabilities available with UNE-E at this time are also available, at the same prices, using the new ordering process. (If Qwest built limitations into its generic UNE-Star product that are not part of Eschelon's UNE-E interconnection amendment, those restrictions would not apply to Eschelon or any CLEC opting into Eschelon's amendment.) We also need to ensure that there is no adverse customer impact. As discussed below, Jeff Thompson of Qwest previously advised Eschelon not to move to new UNE-E ordering until after the embedded base was converted. We do not know why that direction has changed and want to confirm performance before deciding whether to proceed with the new ordering process for all of our orders. Please discuss with Bonnie Johnson when test orders for new UNE-E orders can be placed.

Below is more background information/detail.

### **Manual handling under current plan v. promised mechanization**

On May 23, 2001, Qwest told Eschelon that it was developing a tool to do the work on its side to ensure accurate UNE-E provisioning and billing. Qwest said that this tool would involve a billing change only, except in limited circumstances. Eschelon asked Qwest for more detail so that Eschelon could estimate the number of Eschelon customers the non-billing only changes would involve. ("Jeff agreed to provide a written description of the two types of

activities/results that will occur: (1) changes to billing systems only, where no information flows to the switch **and thus customers are not affected**; and (2) changes that are not to billing systems only, so data will flow to the switch, and changes will be made to customer's lines/service, by COB on June 1st." See enclosed email summary.) In response, Qwest (Dennis Martinez and Jeff Thompson) provided the enclosed matrix. It describes the changes that Qwest said it was in the process of making at that time to convert Eschelon's base (so it would receive accurate UNE-E bills and Qwest could provision UNE-E). According to that chart, every change was "internal to the billing system," with only one exception. **The only change requiring "service orders** to convert provisioning and billing" was "Measured Service to Non-Measured Service" for resale POTS to UNE-Star POTS conversion. As indicated in the enclosed emails confirming Eschelon's understanding of this chart, the latter orders constitute only approx. 1% of Eschelon's base. Therefore, Eschelon understood that, when the promised system changes were made, only 1% of Eschelon's base would be exposed to potential adverse end-user impact from risk of service order and associated errors. The other 99% of the work would be billing changes only, with no risk to the end-user customer's service.

Initially, when Qwest presented what it called "Option 2" for UNE-E mechanization, Qwest said that it still had not completed the promised systems work and that doing so would require 4200 hours of development. Later, Qwest presented a "Revised Option 2" that required no development and instead the USOCs simply need to be loaded and some testing conducted. Qwest explained that, when it presented its previous version of "Option 2," it had not involved the Qwest personnel from the original UNE-E team. After checking with them, Qwest said it found that the development had been completed already. Therefore, it appeared that the "tool" promised by Qwest was already developed.

Under the current plan, however, Qwest has said that it will type service orders in **every** instance. This is dramatically different from the promises made to Eschelon in making the interconnection agreement amendment and in discussions with Qwest at the time that Qwest's internal UNE-Star team was claiming it was implementing the agreement. See, e.g., enclosed Qwest chart (service orders required in only **one** minor instance). This new plan introduces at least two major categories of risk of harm to adverse end-users: (1) typing errors in entry of service orders; and (2) failure to add the FID that Qwest has said is necessary to prevent the order from flowing through to the switch and assignments. These risks are too great, and they are not what Eschelon bargained for. The risks are particularly unacceptable because Qwest has said that it will provide no guarantee to Eschelon that harm will not result or that Eschelon will be made whole for the harm. Eschelon has no protection, therefore, from the risk now introduced by Qwest.

### **Resource burden on Eschelon for work Qwest committed to do**

In addition to the risk of adverse customer impact, Qwest's current plan introduces a resource burden for Eschelon that was not anticipated or bargained

for. Given Qwest's new plan, Eschelon would have to devote resources to project managing this project and working on and escalating any problems resulting from errors that inevitably result from manual handling of service orders. Though no LSR's need to be sent Eschelon would still have a need to:

1. Identify accounts for migration and communicate information to Qwest
2. Change line type in TBS. (this would require placing a TBS order on each account)
3. Flag ONYX that the account is converting
4. Flag access care the account is converting
5. Work escalations with Qwest when customer is

impacted.

Also, although Qwest changed its response to indicate that there would be no moratorium (processing time while orders are in progress), there would have to be some period of time when a change could not be made because other work was being done. This is customer impacting.



Conversion Review



[Fwd: [Fwd: FW:  
Conversion Rev...



IT call today/summary

Karen L. Clauson  
Sr. Director of Interconnection  
Eschelon Telecom, Inc.  
730 2nd Ave. South, Suite 1200  
Minneapolis, MN 55402  
Phone: 612-436-6026  
Fax: 612-436-6126



-----Original Message-----

**From:** Dennis Martinez [SMTP:dm mart1@uswest.com]  
**Sent:** Friday, June 01, 2001 4:19 PM  
**To:** Mark Routh; Clauson, Karen L.  
**Cc:** Jeffery Thompson; Freddi Pennington; Terri Davis  
**Subject:** Conversion Review

The attached document contains information on the changes that will take place for the conversion of POTS and Centrex to UNE-STAR services.

Please let me know if you have any questions or concerns.



eschelon UNE.doc



Card for Dennis  
Martinez

Dennis Martinez



Resale POTS to UNE – STAR POTS Conversion	
<b><u>Changes:</u></b> <ol style="list-style-type: none"> <li>1) CSR Appearance</li> <li>2) Product Rates</li> <li>3) Measured Service to Non-Measured Service</li> <li>4) Packages will be unbundled, all features will be individually rated and displayed.</li> <li>5) A mechanized process will be implemented for the suppression of Switched Access.</li> <li>6) PICC charges will not be billed.</li> </ol>	<b><u>Systems:</u></b> <ol style="list-style-type: none"> <li>1) Internal to the billing system</li> <li>2) Internal to the billing system</li> <li>3) Will require service orders to convert provisioning and billing.</li> <li>4) Internal to the billing system</li> <li>5) Internal to the billing system</li> <li>6) I</li> <li>7) Internal to the billing system</li> </ol>

Resale Centrex to UNE – STAR Centrex Conversion	
<b><u>Changes:</u></b> <ol style="list-style-type: none"> <li>1) CSR Appearance</li> <li>2) Product Rates</li> <li>3) A mechanized process will be implemented for the suppression of Switched Access.</li> <li>4) PICC charges will not be billed.</li> </ol>	<b><u>Systems:</u></b> <ol style="list-style-type: none"> <li>1) Internal to the billing system</li> <li>2) Internal to the billing system</li> <li>3) Internal to the billing system</li> <li>4) Internal to the billing system</li> </ol>

-----Original Message-----

**From:** Jeffery Thompson [SMTP:jlthomp@uswest.com]  
**Sent:** Monday, June 04, 2001 11:58 AM  
**To:** Clauson, Karen L.  
**Cc:** Powers, F. Lynne; Dennis Martinez; Freddi Pennington  
**Subject:** [Fwd: [Fwd: FW: Conversion Review]]

Karen:

Yes, the chart from Dennis is the response to my action item (thank you Dennis), and as you can see below, Dennis agrees that you have accurately assessed the data in the chart, with the exception of the customer volumes you have stated, upon which we will reserve comment.

Thanks  
Jeff

Dennis Martinez wrote:

> Jeff,  
>  
> Karen has accurately depicted the chart I provided. Eschelon  
> customers are at risk to have service and/or features effected only when  
> Qwest is processing an order through provisioning. All other activities  
> are internal to billing and will only appear on outputs (i.e. Bill, DUF)  
> from Qwest to Eschelon. As far as the percentage of customers Karen  
> refers to I am not in a position to address this issue and assume she  
> has a good handle on her customer base.  
>  
> Let me know if you have any questions on Karen's reply.  
>  
> Dennis Martinez  
>  
> -----  
>  
> Subject: FW: Conversion Review  
> Date: Fri, 1 Jun 2001 17:18:04 -0500  
> From: "Clauson, Karen L." <klclauson@eschelon.com>  
> To: Jeffery Thompson <jlthomp@uswest.com>  
> CC: Dennis Martinez <dmmart1@uswest.com>, Mark Routh  
> <mrouth@uswest.com>,  
> Freddi Pennington <ppennin@uswest.com>, Terri Davis  
> <tidavis@uswest.com>,  
> "Powers, F. Lynne" <flpowers@eschelon.com>,  
> "Oxley, J. Jeffery"

> <jjoxley@eschelon.com>  
>  
> Jeff:  
> Is the email below Qwest's response to your action item for today  
> (copied below)? We asked for a written description that is in a format  
> readily understandable to Audrey and Rick and which would allow us to  
> estimate how many of our lines could potentially be affected by conversion  
> of the embedded base. You indicated that you would do so and describe two  
> categories of changes: (1) changes to billing systems only, where no  
> information flows to the switch and thus customers are not affected; and (2)  
> changes that are not to billing systems only, so data will flow to the  
> switch, and changes will be made to customer's lines/service. The enclosed  
> chart didn't come with any explanation, so let me ask a few questions to  
> confirm what appears to be Qwest's response and avoid misunderstandings:  
> --Are all of the items that are identified on the enclosure as  
> "internal to the billing system" category 1 changes, where there is no  
> possibility of adverse customer impact?  
> --Is the item identified as "Will require service orders to convert  
> provisioning and billing" a category 2 change, where data will flow to the  
> switch, so Qwest will need to ensure that customers are not adversely  
> affected? IF SO:  
> -The chart only identifies one category 2 change (Measured  
> service to non-measured service). Is this the single potentially customer  
> impacting change?  
> If only about 1 percent of our embedded resale base has  
> measured service, are we safe in assuming that the risk of any adverse  
> customer impact (including loss of features, etc., as well as loss of  
> service) from conversion of the base is limited to approximately one percent  
> of our base?  
> If not, what are the other changes, or how have we misunderstood the  
> enclosed information? We need this confirmation for upcoming conversations  
> between Rick and Audrey, so would appreciate clarification as soon as  
> possible. Thanks.  
>  
> FROM 5/23/ CALL SUMMARY, LAST ITEM:  
>  
> Additional Issues/Follow Up to Previous Discussions on Embedded  
> Base:  
>  
> Eschelon observed that the information provided today, such as  
> changing the RSID to ZSID, etc., seems to assume actions being taken as to  
> the embedded base. Rick Smith, from his discussions with Audrey McKenney,  
> however, has an understanding that the base will not be "touched,"  
> particularly in the sense that Eschelon's customers will not be adversely  
> affected. Freddi said that, to provide switched access to Eschelon, Qwest  
> will make some actual changes. She said that, rather than Eschelon

> submitting LSRs for each order in the embedded base to make these changes,  
> Qwest is developing a tool to do the work on its side. Lynne referred to  
> her previous letter to Audrey on this issue in which Eschelon discussed the  
> need to ensure that Eschelon's customers aren't affected when Qwest does so.  
> For example, we had previously discussed whether feature packages would  
> convert and, if not, ensuring that customers didn't lose features or service  
> as a result. Kathy said that all feature packages will convert from resale  
> to UNE-STAR in tact. Kathy said that only some line USOCs and packages  
> associated with USOCs such as Custom Choice will not. Lynne asked for a  
> written explanation as to what changes are being made and how Qwest will  
> ensure that Eschelon's customers don't suffer. Lynne said that Qwest needs  
> to have some skin in the game to ensure that this goes smoothly. Jeff said  
> that he can describe the changes but that Audrey would need to deal with the  
> economic consequences of things not going smoothly. Eschelon asked that  
> Jeff provide enough detail that the issues would be clear to Audrey and Rick  
> and so that Eschelon can estimate the number of Eschelon customers that the  
> non-billing only changes may involve.

> Action: Jeff agreed to provide a written description of the two  
> types of activities/results that will occur: (1) changes to billing systems  
> only, where no information flows to the switch and thus customers are not  
> affected; and (2) changes that are not to billing systems only, so data will  
> flow to the switch, and changes will be made to customer's lines/service, by  
> COB on June 1st.

>

> > -----Original Message-----

> > From: Dennis Martinez [SMTP:dm mart1@uswest.com]

> > Sent: Friday, June 01, 2001 4:19 PM

> > To: Mark Routh; klclauson@eschelon.com

> > Cc: Jeffery Thompson; Freddi Pennington; Terri Davis

> > Subject: Conversion Review

> >

> >

> >

> > The attached document contains information on the changes that will take  
> > place for the conversion of POTS and Centrex to UNE-STAR services.

> >

> > Please let me know if you have any questions or concerns.

> >

> > Dennis Martinez <<eschelon UNE.doc>> <<Card for Dennis Martinez>>

>

> -----

> Name: eschelon UNE.doc

> eschelon UNE.doc Type: Microsoft Word Document (application/msword)

> Encoding: base64

>

> Dennis Martinez <dm mart1@uswest.com>

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> Information Technologies  
> Wholesale - BAP  
>  
> Dennis Martinez  
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> 80202  
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> Last Name   Martinez  
> First Name   Dennis  
> Version     2.1  
>  
> -----  
>  
> Dennis Martinez <dm mart1@uswest.com>  
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> 80202  
> Additional Information:  
> Last Name   Martinez  
> First Name   Dennis  
> Version     2.1

-----Original Message-----

**From:** Clauson, Karen L.  
**Sent:** Wednesday, May 23, 2001 6:54 PM  
**To:** 'Mark Routh'; 'ppennin@uswest.com'; 'krein@Qwest.com'; 'jlthomp@uswest.com'; Powers, F. Lynne  
**Subject:** IT call today/summary

Here is a summary from today's call. Please let me know if I have inadvertently misstated anything. Also, please pass along to Dennnis. I do not have his email address. Thanks.

Qwest Participants: Mark Routh, Jeff Thompson, Dennis M., Freddi Pennington, Kathy Rein  
Eschelon Participants: Lynne Powers, Karen Clauson

*Cutover Issues:* Lynne said that we lost 30 cuts today due to Qwest's ASMS system, which connects to SPAC, being down. Denver knew about the problem, but Omaha did not and went ahead. Lynne said that this happens at least one day a month and is costing us customers.

*Action Items from March 28, 2001 meeting:*

**1. When will Eschelon be able to review the list of USOC's included in our UNE-E product? Kathy Rein planed to get the list to IT on Friday March 30<sup>th</sup> and Eschelon should receive it by April 20<sup>th</sup>, 2001. *Action: never received list.***

Kathy Rein said that she has the list. Freddi and Kathy indicated that some of the USOCs will be the same as those currently used for resale orders and others will be new for "UNE-STAR." Kathy said that the list will be a complete list of the USOCs for UNE-E. Action: Kathy agreed to provide the USOC list to Lynne and Karen by COB on May 24, 2001.

**2. Best case scenerio was that UNE-E would be implemented in IMA 7.01 and Eschelon would begin ordering resale products differently. *Action: Not clear what will happen with IMA 7.01 as it relates to Eschelon ordering.***

Jeff asked about "UNE-E." Kathy and Freddi indicated that Qwest considers UNE-E and UNE-STAR as the same thing. Jeff said that Eschelon should wait to implement UNE-E until Qwest changes its back end legacy systems to bill for UNE-STAR (rather than changing ordering when 7.01 is released). Lynne indicated that we need notice of when that will happen and training before it is implemented. Eschelon clarified that when the parties use the term "embedded base," they are referring to Eschelon's customers/lines before the move to ordering UNE-E (after the back end legacy systems can bill for UNE-E). Therefore, the longer it takes to start using the new ordering procedures, the longer/larger the embedded base will be. Freddie said that is Qwest's understanding as well. Action: Freddi agreed to provide a schedule of the dates for implementation of CRIS billing, IMA, conversion from resale to UNE-STAR (when base is converted to ZSID), availability of documentation on products and

ordering, and availability of training on products and ordering by COB on May 25, 2001.

Eschelon indicated that Qwest's comments regarding the availability of web-based training, UNE-E and UNE-STAR being the same, etc., suggested that the release notices, product information, and training would be the same for Eschelon as for other CLECs. Eschelon asked whether there would be any issues unique to Eschelon/UNE-E. Action: Jeff agreed to send Lynne and Karen an email, after talking with Sue McNae, as to whether training and information will be the same or different in some respects for UNE-E.

**3. Jeff Thompson to explain how we are going to track originating LD for UNE-E lines. Qwest and Eschelon have agreed to engage in mutual audit with Price Waterhouse/Arthur Anderson - waiting for Audrey McKenney to execute..** Issue for Audrey McKenney/not this call.

**4. Eschelon needs to know how to do an audit of the local MOU or 525 minutes per line. Qwest and Eschelon have agreed to engage in mutual audit with Price Waterhouse/Arthur Anderson - waiting for Audrey McKenney to execute.** Issue for Audrey McKenney/not this call.

**5. Kathy Rein to provide a flow chart of the ordering activity for UNE-E. No word on this yet.** Kathy forwarded a flow chart to Lynne and Karen after the call.

**6. Kathy Rein to check on why Eschelon does not receive complete completion report information. Action: No word on this yet.**

Kathy said that Qwest is currently experiencing trouble with Centrex that involves the difference in using telephon and station numbers. Qwest is working on it. Jeff said that the changes will be part of the changes made to the legacy systems.

With respect to Eschelon's pending CR on clarity and completeness of loss and completion reports, Jeff said that Qwest will need to confirm whether changes made will be made as to UNE-STAR. Lynne said that she will get more information about the issues we are having and work with Steve (account rep) to resolve them.

*Additional Issues/Follow Up to Previous Discussions on Embedded Base:*

Eschelon observed that the information provided today, such as changing the RSID to ZSID, etc., seems to assume actions being taken as to the embedded base. Rick Smith, from his discussions with Audrey McKenney, however, has an understanding that the base will not be "touched," particularly in the sense that Eschelon's customers will not be adversely affected. Freddi said that, to provide switched access to Eschelon, Qwest will make some actual changes. She said that, rather than Eschelon submitting LSRs for each order in



the embedded base to make these changes, Qwest is developing a tool to do the work on its side. Lynne referred to her previous letter to Audrey on this issue in which Eschelon discussed the need to ensure that Eschelon's customers aren't affected when Qwest does so. For example, we had previously discussed whether feature packages would convert and, if not, ensuring that customers didn't lose features or service as a result. Kathy said that all feature packages will convert from resale to UNE-STAR in tact. Kathy said that only some line USOCs and packages associated with USOCs such as Custom Choice will not. Lynne asked for a written explanation as to what changes are being made and how Qwest will ensure that Eschelon's customers don't suffer. Lynne said that Qwest needs to have some skin in the game to ensure that this goes smoothly. Jeff said that he can describe the changes but that Audrey would need to deal with the economic consequences of things not going smoothly. Eschelon asked that Jeff provide enough detail that the issues would be clear to Audrey and Rick and so that Eschelon can estimate the number of Eschelon customers that the non-billing only changes may involve.

Action: Jeff agreed to provide a written description of the two types of activities/results that will occur: (1) changes to billing systems only, where no information flows to the switch and thus customers are not affected; and (2) changes that are not to billing systems only, so data will flow to the switch, and changes will be made to customer's lines/service, by COB on June 1st.

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